

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Rodney Parker SCDC #315646,) Civil Action No. 5:13-2795-TLW-KDW
)
)
Plaintiff,)
)
)
v.)
)
Warden Stevenson; Major Sutton;)
Captain Washington; Lt. Jackson; Sgt.)
Esterline; Sgt. JC Williams; Ofc. Beckett;)
Ofc. McCoy; Ofc. Suarez; Ofc. Dooley;)
Nurse K. McCullough; and Nurse Jane)
Doe,)
)
Defendants.)

**DEFENDANTS' DISCLOSURE OF
EXPERT WITNESSES**

NOW COMES the Defendants Stevenson, Sutton, Washington, Jackson, Esterline, Williams, Beckett, McCoy, Suarez, Dooley and McCullough, by and through their counsel who herein designate the following as an expert witness, pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure:

A. Emmitt L. Sparkman
Correctional Consultant
4783 Wesson Heights Drive
Olive Branch, Mississippi 38654
662.231.6872
ellesparkman@gmail.com

Mr. Sparkman is a self-employed Correctional Consultant and is expected to testify and offer opinions related to the cause of the alleged incident at issue in the present case. Mr. Sparkman is expected to offer testimony regarding the proper practices and procedures for use of force by officers in correctional institutions. Mr. Sparkman is further expected to testify that the use of force used in the incident was not excessive. A complete copy of Mr. Sparkman's report, including his opinions, the facts and data considered, supporting exhibits, his qualifications, his prior testifying experiences and a statement of his compensation will be produced to Plaintiff's counsel in accordance with Fed.R.Civ.P. 26(a)(2). These Defendants reserve the right to supplement, modify or amend their disclosures prior to trial pursuant to Fed.R.Civ.P. 26(e).

B. Sherry Dale, L.P.N.

Nurse

Camille Griffin Graham Correctional Institution
4450 Broad River Road
Columbia, SC 29210

Sherry Dale is a Licensed Practical Nurse for the South Carolina Department of Corrections at the Camille Griffin Graham Correctional Institution, but previously worked at Broad River Correctional Institution. She is expected to testify and offer opinions related to the medical treatment offered to Plaintiff following the incident at issue in the present case. Nurse Dale is also expected to offer testimony regarding her observation and assessment of Plaintiff's medical condition after the alleged incident and may authenticate and offer testimony regarding Plaintiff's medical records. A complete copy of Nurse Dale's Affidavit, which was filed with Defendants' Motion for Summary Judgment, will be produced to all counsel in accordance with Fed.R.Civ.P. 26(a)(2). These Defendants reserve the right to supplement, modify or amend their disclosures prior to trial pursuant to Fed.R.Civ.P. 26(e).

C. Karen McCullough

Nurse

SCDC Mental Health

Karen McCullough is a nurse for the South Carolina Department of Corrections currently working with SCDC's Mental Health Department but previously worked at Broad River Correctional Institution. She is expected to testify and offer opinions related to the medical treatment offered to Plaintiff following the incident at issue in the present case. Nurse McCullough is also expected to offer testimony regarding her observation and assessment of Plaintiff's medical condition after the alleged incident and may authenticate and offer testimony regarding Plaintiff's medical records. These Defendants reserve the right to supplement, modify or amend their disclosures prior to trial pursuant to Fed.R.Civ.P. 26(e).

[Signature Page to Follow]

Respectfully submitted this the 4th day of May, 2017.

**RICHARDSON, PLOWDEN & ROBINSON,
P.A.**

s/ Caleb Martin Riser

Drew Hamilton Butler [Federal Id. 8083]

Caleb M. Riser [Federal Id. 10666]

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Attorney for Defendants